

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	No. 19 CR 567
Plaintiff,	)	
	)	Judge Martha M. Pacold
v.	)	
	)	
ROBERT SYLVESTER KELLY,	)	
	)	
Defendant.	)	

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

**JENNIFER A. BONJEAN**, one of the lead counsel for Defendant, **ROBERT SYLVESTER KELLY**, respectfully moves this Court for leave to withdraw as counsel for Defendant pursuant to Local Rule 83.17.

1. On February 18, 2022, Ms. Bonjean filed her appearance as lead attorney for Mr. Kelly. Dkt. 183.

2. Ms. Bonjean has represented Mr. Kelly as lead counsel for the duration of his jury trial before the Honorable Judge Harry D. Leinenweber, through sentencing and Mr. Kelly's direct appeal before the Seventh Circuit, and until the disposition of the United States Supreme Court, denying his petition for writ of certiorari to the United States Court of Appeals for the Second Circuit. *See Kelly v. United States*, No. 24-1172, 2025 U.S. LEXIS 2397 (June 23, 2025).

3. Mr. Kelly has retained new counsel, Beau B. Brindley, from the Law Offices of Beau B. Brindley.

3. On May 29, 2024, Beau B. Brindley filed his appearance as lead counsel for Mr. Kelly. Dkt. 462.

6. Mr. Kelly will continue to be represented by the remaining lead attorney of record, Beau B. Brindley.

7. No party will be prejudiced if Ms. Bonjean is permitted to withdraw her appearance.

8. Accordingly, Ms. Bonjean respectfully seeks leave of Court to withdraw from the representation.

WHEREFORE, counsel respectfully asks the Court to grant this Motion to Withdraw.

Respectfully submitted,

/s/ Jennifer A. Bonjean

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*One of the Attorneys for Defendant Robert  
Kelly*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document has been served on all counsel of record via the Court's Case Management/Electronic Case Filing and/or electronic mail on June 26, 2025.

Respectfully submitted,

/s/ Jennifer A. Bonjean\_\_\_\_\_

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